IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

JASON B. HAMILTON :

CHRISTINE MARIE HAMILTON : CASE NO. 1:19-bk-03853

Debtors

:

PENNYMAC LOAN SERVICES LLC,

Movant

:

v. :

:

JASON B. HAMILTON

CHRISTINE MARIE HAMILTON,

Respondents

:

:

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
- 6. Admitted that Debtors did not make several post-petition payments; however, the Debtors have reached an agreement with Movant to cure the deficiency.
- 7. Admitted.
- 8. Denied that Movant has demonstrated cause for relief because the Debtors have reached an agreement with Movant to cure the deficiency.
- 9. Admitted.

10. No response required.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire Mott & Gendron Law Attorney ID # 43568 125 State Street Harrisburg, PA 17101 (717) 232–6650 TEL (717) 232-0477 FAX doriemott@aol.com